

EXHIBIT 1

From: [Tucker, Jacob P.](#)
To: [Yetta G. Kurland](#); [Philion, Rachel S.](#)
Cc: [Lora Minicucci](#); [Hurd, Steven D.](#); [Bashinski, Hayden F.](#); [David B. Rankin](#); [Tala Alfoqaha](#); [Jackie BeVier](#)
Subject: RE: Local 2507 et al v. City of New York 22cv10336 [rel20cv3389]
Date: Monday, July 14, 2025 1:49:00 PM

Yetta –

The City consents to adjourning any noticed deposition dates until the parties have more clarity on the discovery schedule. To be clear, at this time we are only agreeing to schedule depositions for which we have agreed to provide a witness and are not waiving any of our objections to deposition notices. Of course, we understand that Plaintiffs are not waiving their objections either.

Best,

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From: Yetta G. Kurland <kurland@kurlandgroup.com>
Sent: Monday, July 14, 2025 9:29 AM
To: Philion, Rachel S. <rphilion@proskauer.com>
Cc: Lora Minicucci <lminicuc@law.nyc.gov>; Hurd, Steven D. <shurd@proskauer.com>; Tucker, Jacob P. <jtucker@proskauer.com>; Bashinski, Hayden F. <HBashinski@proskauer.com>; David B. Rankin <DRankin@blhny.com>; Tala Alfoqaha <talfoqaha@blhny.com>; Jackie BeVier <jbevier@blhny.com>
Subject: Local 2507 et al v. City of New York 22cv10336 [rel20cv3389]

This email sent by kurland@kurlandgroup.com originated from outside the Firm.

Hi Rachel,

I wanted to check in on deposition scheduling. We did not get to discuss this last week. Given the Court's Order including the adjournment of deadlines, I think we should likewise adjourn our deposition dates. I know you had provided a date for Don Nguyen, and we had both served notices for depositions at the end of July and early August.

Can we agree to reschedule these all, but to hold off until the Court rules on the schedule after which we can confer and set dates?

Best,
Yetta

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